



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels, Jr.*  
Governor

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May 26, 2011

Mr. Bob Lewis  
Environmental, Safety and DOT Compliance Manager  
Genuine Parts Company  
2999 Circle 75 Parkway  
Atlanta, GA 30339

Re: Remedial Progress Report  
Former Allison Plant 10  
700 North Olin Avenue  
Indianapolis, Indiana  
VRP #6991004

Dear Mr. Lewis:

The Indiana Department of Environmental Management (IDEM) has reviewed the Remedial Progress Report, submitted March 15, 2011, for the Former Allison Plant 10 site located in Indianapolis, Indiana. IDEM has the following comments.

1. The consultant has requested to remove PAHs and metals from future ground water sampling events. This is acceptable.
2. The consultant has also requested to reduce sampling frequency from quarterly to semi-annual sampling for the entire monitoring well network. This is acceptable.
3. Well nests 167 and 169 were requested to be removed from the monitoring program. IDEM agrees that well nest 169 and MW-167S can be removed from the monitoring program; however, IDEM would like MW-167D to continue to be sampled on a semi-annual basis. Also, the removed wells from the monitoring program should be kept open for confirmatory sampling for closure purposes.
4. On page 6 of the report, the cleanup goals for the vapor intrusion pathway were determined to be 1,800- $\mu$ g/L for TCE, 104,000- $\mu$ g/L for cis-1,2-dichloroethene, and 198- $\mu$ g/L for vinyl chloride. It is unclear how these numbers were determined. These numbers are higher than the Commercial Ground Water Screening Levels for Selected Chlorinated Compounds. Clarifications on how these numbers were determined should be provided.
5. In the executive summary, the consultant noted that IDEM approved the institutional control utilizing the no well zone. IDEM agrees that an enforceable no well zone can be an acceptable exposure control for the residual contamination. However, since wells were found within the no well zone, assurance will need to be provided that the exposure control will be effectively implemented over the remaining life of the plume.

Please respond to the above comments within sixty days from the date of this letter. If you have any questions, please contact me at (317) 233-2991, (800) 451-6027, or at [ebrittai@idem.in.gov](mailto:ebrittai@idem.in.gov).

Sincerely,

Erin Brittain, Project Manager  
Voluntary Remediation Program  
Office of Land Quality

cc: Andy Gremos, Environ, One Indiana Square, Suite 2550, Indianapolis, IN 46204